

Exhibit 2

Johnson, Dan

From: MacDougall, Mark <mmacdougall@AKINGUMP.COM>
Sent: Thursday, April 18, 2019 10:25 AM
To: Johnson, Dan
Subject: FW: Rule 17(c) Subpoenas - Draft Protective Order
Attachments: 2019.04.12 DRAFT Protective Order for Rule 17(c) Subpoenad Material 4828-0182-7732 2 (003).docx

Mark J. MacDougall

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From: MacDougall, Mark
Sent: Tuesday, April 16, 2019 3:43 PM
To: 'Kelner, Robert' <rkelner@cov.com>; Anthony, Stephen <santhony@cov.com>; Walker, Robert <RLWalker@wileyrein.com>
Cc: Mitchell, Stacey <shmittchell@akingump.com>; Trout, Robert (External) <robert.trout@akingump.com>; Murphy, Jack <jmurphy@AKINGUMP.com>; Solomon, Gloria (External) <Gloria.Solomon@akingump.com>
Subject: Rule 17(c) Subpoenas - Draft Protective Order

Rob, Steve and Bob,

Attached is a draft protective order which is intended to meet the requirements set down by Judge Trenga in his Order of April 9, 2019. There is a status conference scheduled for Friday, April 19 and, as you know, pursuant to the same Order, production in response to the Rule 17(c) subpoenas is to be completed by April 20, 2019. So please let us know if you have any edits to this draft protective order as we would like to have it submitted to the Court well in advance of Friday's status conference.

Thanks.

Mark

Mark J. MacDougall

AKIN GUMP STRAUSS HAUER & FELD LLP

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Please note that on May 6, 2019, our address will change to 2001 K Street N.W., Washington, DC 20006

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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal Case No. 1:18-CR-457 (AJT)
	:	
BIJAN RAFIEKIAN, et al.	:	

PROTECTIVE ORDER

The Court having directed Covington & Burling LLP ("Covington") and Kristin Verderame to produce "all documents within the scope of the subpoenas *duces tecum* . . . pursuant to a protective order to be agreed upon by the parties," and the parties having agreed upon the entry of this protective order, it is hereby ORDERED that:

1. The production of any document by Covington and Verderame shall not constitute a waiver of any privilege or protection with respect to those documents or their subject matter in this or any proceeding.

2. The use of any document referenced in paragraph 1 above in a court filing shall not constitute a waiver of any privilege or protection with respect to those documents, provided that such documents are filed under seal.

3. Except with the prior authorization of the Court, the defendant and his attorneys shall not disclose to anyone the contents of the documents provided by Covington and Verderame.

4. Except with the prior authorization of the Court, any filing that mentions the contents of the documents provided by Covington and Verderame shall be filed under seal as well as filed through the ECF system with all such information redacted.

5. This Order shall be interpreted to provide the greatest protection allowed by Federal Rule of Evidence 502, or otherwise permitted by law.

6. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated:
Alexandria, Virginia

The Honorable Anthony J. Trenga
United States District Judge

WE ASK FOR THIS:

/s/

Robert P. Trout
Mark J. MacDougall
Stacey H. Mitchell
John C. Murphy

Counsel for the Defendant

KRISTEN VERDERAME
By Counsel

/s/

Brandon J. Moss
Mark B. Sweet

Counsel for Kristen Verderame

COVINGTON & BURLING LLP
By Counsel

/s/
Daniel E. Johnson

Counsel for Covington & Burling LLP